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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

10 LELEND NAEHU, an individual; and
11 K. N., a minor, by and through her Guardian
12 ASHLEE NAEHU
13 Plaintiffs

13 vs.

14 JAMAR LAKEITH GLASPER, an
15 individual; UNITED STATES OF AMERICA,
16 through the UNITED STATES POSTAL
17 SERVICE, an agency of the Government of the
18 United States of America, DOES 1 through
19 10, inclusive; and ROE BUSINESS
20 ENTITIES 1 through 10 inclusive,
21 Defendants

CASE NO: 2:24-cv-01705-CDS-BNW

**Order Approving STIPULATION
TO EXTEND DEADLINE FOR
OPPOSITION TO FEDERAL
DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS'
COMPLAINT**

[ECF No. 19]

20 Pursuant to Fed. R. Civ. P. 6(b)(1)(B), as well as LR IA 6-1, LR 26-3, Plaintiffs, Lelend
21 Naehu and K.N., a minor, thorough her Guardian Ashlee Naehu, and Defendant United States
22 of America, by and through their undersigned counsel, stipulate and agree to an extension to
23 file Plaintiffs' Opposition to Federal Defendants' Motion to Dismiss Plaintiffs' Complaint. The
24 current deadline is January 17, 2025. The parties agree and stipulate that Plaintiffs' time to
25 respond to defendants' motion to dismiss shall be **extended by 15 days to January 31, 2025**.
26 This is the first request for extension.

27 On January 13, 2025, Defendants filed a motion to dismiss plaintiffs' complaint in its
28 entirety on the grounds that Plaintiffs failed to timely submit their administrative claims for

1 traffic accident to the USPS; Plaintiffs' claims for negligence per se and respondeat superior
2 are not recognized as separate causes of action under the FTCA; and that the USPS driver
3 (Glasper) and the USPS should be dismissed because United States agencies and employees
4 cannot be sued under the FTCA. Further, Defendants claim that attorney's fees and prejudgment
5 interest are not proper in an FTCA action and require dismissal.

6 This request is not made for the purpose of causing undue delay and prejudice. The
7 parties are acting in good faith to get this case resolved.

8 For the foregoing reasons, the parties request that the Court extend the deadline for
9 the opposition to defendants' motion to dismiss Plaintiffs' complaint to January 31, 2025.

10 Respectfully submitted this 17th day of January, 2025

11 RALPH A. SCHWARTZ, P.C.

U.S. ATTORNEYS OFFICE

12
13 /s/ Ralph A. Schwartz

/s/ Karissa D. Neff, Esq.

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20 Based on the parties' stipulation, the deadline for plaintiffs to file an
21 opposition to defendants' motion to dismiss is extended to January 31,
22 2025.

23
24 
UNITED STATES DISTRICT JUDGE

25 DATED: January 21, 2025